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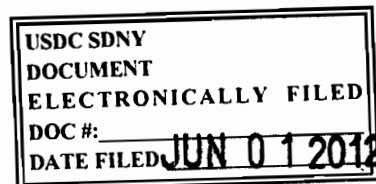
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May 31, 2012

Honorable Katherine B. Forrest
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007



RE: *Realtime Data v. Morgan Stanley, et al.*, 1:11-cv-6696 (S.D.N.Y.);
Realtime Data v. CME, et al., 1:11-cv-6697 (S.D.N.Y.);
Realtime Data v. Thomson Reuters, et al., No. 1:11-cv-6698 (S.D.N.Y.)

Dear Judge Forrest:

We write on behalf of Plaintiff Realtime Data, LLC d/b/a IXO ("Realtime") to respectfully request that Realtime be granted leave to take the below-listed depositions after the June 4, 2012 close of fact discovery. Realtime's request will not affect the post-June 4, 2012 deadlines set forth in the Court's February 15, 2012 Scheduling Order, and defendants either join or do not oppose the relief requested herein.

Defendant HSBC, Paul Rovello 30(b)(1) Deposition - Confirmed for June 6, 2012.

Non-Party Jim Northey Deposition - Confirmed for June 7, 2012. Mr. Northey, a non-party who was subpoenaed by Realtime, was involved in the development of the FAST protocol. Mr. Northey only had one available date in the more than six weeks his subpoena has been pending within fact discovery and Realtime was not available on that date.

Defendant Goldman Sachs, Adam Schlesinger 30(b)(1) Deposition - Confirmed for June 8, 2012.

Defendant Bloomberg 30(b)(6) Deposition - Scheduling for on or before June 7, 2012. Realtime and Bloomberg have endeavored to complete a Rule 30(b)(6) deposition of Bloomberg on Topics 2 and 3 of my April 12, 2012 letter to the Court before the close of fact discovery, and tentatively scheduled the deposition for May 31, 2012. However, the parties require additional time for this deposition and jointly seek permission to take this deposition after June 4 because Bloomberg has not yet completed its production of documents responsive to Topics 2 and 3. Bloomberg is continuing to work towards completing its production of documents responsive to Topics 2 and 3, and the parties will work together to schedule the Rule 30(b)(6) deposition on

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Topics 2 and 3 for a date on or before June 7, 2012, following completion of Bloomberg's production.

Defendant Morgan Stanley 30(b)(6) Deposition and 30(b)(1) Depositions - Scheduling for after June 4, 2012. Realtime and Morgan Stanley may need to schedule a Rule 30(b)(6) deposition on costs and one or more of four Rule 30(b)(1) depositions of specific individuals (Hugh Alexander, Beat Ammon, John Donaldson and Jason Todd) identified by Morgan Stanley's Rule 30(b)(6) witness as possibly having additional information about the network infrastructure and costs associated with receiving FAST feeds for specific groups within Morgan Stanley. Morgan Stanley is in the process of collecting additional cost and network documentation, and while the parties expect that this documentation should obviate the need for some, if not all, of these additional depositions, Realtime seeks leave of the Court to schedule limited, additional depositions (of the individuals and 30(b)(6) witness as identified above) after the close of discovery, if necessary following Morgan Stanley's production of documents.

Defendant J.P. Morgan Chase 30(b)(1) Depositions - Scheduling for after June 4, 2012. Realtime and J.P. Morgan Chase are working to find a date for the Rule 30(b)(1) deposition of Robert Grubelic. J.P. Morgan is inquiring about dates for Robert Grubelic for the week of June 4, 2012. Realtime may also seek to schedule a date for the Rule 30(b)(1) deposition of Lonnie Glassman. J.P. Morgan is in the process of producing additional documentation which the parties expect will obviate the need for Mr. Glassman's deposition, but Realtime seeks leave to schedule this additional deposition after the close of discovery if the documents J.P. Morgan produces reasonably require additional explanation.

Respectfully submitted,


/s/ Robert A. Cote

Robert A. Cote

cc: Counsel of Record

Granted. The Court
assumes this motion plaintiff's
prior letter requesting an
extension of May 31, 2012
discovery.

SO ORDERED:


HON. KATHERINE B. FORREST
UNITED STATES DISTRICT JUDGE